

**JOINT MOTION TO COMPEL ARBITRATION AND
STAY PROCEEDINGS**

COME NOW Plaintiff Randolph Pinkard (“Plaintiff”) and Defendants Credit Acceptance Corporation, R&S Auto Sales, and Roderick Callins (hereinafter referred to collectively as “Defendants”), by and through their undersigned counsel, and hereby jointly move this Court to compel the above-styled matter to arbitration pursuant to a governing contractual arbitration agreement and to stay these proceedings pending the outcome of said arbitration. In support thereof, Plaintiff and Defendants state as follows:

1. Plaintiff's claims against Defendants in the above-styled matter are covered by the arbitration provision contained within the December 4, 2013 Retail Installment Contract attached hereto as Exhibit "A."

2. Plaintiff and Defendants agree that Plaintiff's claims against Defendants in the above-styled matter should be submitted to arbitration with the American Arbitration Association pursuant to the aforementioned agreement.

3. Plaintiff and Defendants agree that Plaintiff's claims against Defendants should be stayed.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Randolph Pinkard and Defendants Credit Acceptance Corporation, R&S Auto Sales, and Roderick Callins jointly and respectfully move this Court to enter the proposed Order attached hereto as Exhibit "B," which compels the above-styled matter to arbitration and stays these proceedings pending the outcome of said arbitration.

Respectfully submitted this 4th day of November, 2014.

/s/ Michael E. Parrish

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